

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

In re: Crystal L. Stamos, Debtor

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Case No. 23-33828-KRH  
Chapter 13

**MOTION TO DISMISS**

COMES NOW Suzanne E. Wade, Chapter 13 Trustee, and moves this Court to dismiss this case for the cause as follows:

1. The Debtor filed this Chapter 13 Petition, now pending in the United States Bankruptcy Court, Eastern District of Virginia, Richmond Division, on 11-03-23, under 11 U.S.C. Chapter 13.
2. The Debtor's most recent confirmed Plan (the "Plan") was filed 11-14-23, and confirmed by Order entered 01-12-24.
3. The Plan's funding appears insufficient to provide creditors with the distributions required by the Plan.
4. As such, the Trustee would suggest the Debtor has caused an unreasonable delay that is prejudicial to creditors, and that dismissal is appropriate pursuant to 11 U.S.C. § 1307(c)(1).

WHEREFORE, for the reasons stated herein, the Chapter 13 Trustee, by Counsel, respectfully moves the Court to dismiss this Chapter 13 case, and for such further and other relief as the Court deems necessary.

Date: July 1, 2024

/s/ Suzanne E. Wade

Suzanne E. Wade, Chapter 13 Trustee

**Suzanne E. Wade, Chapter 13 Trustee**  
Virginia State Bar Number 31868  
7202 Glen Forest Dr., Suite 202  
Richmond, VA 23226  
(804) 775-0979

**CERTIFICATE OF SERVICE**

I hereby certify a true copy of the foregoing MOTION TO DISMISS was served electronically or by first-class mail, postage prepaid, this 1st day of July, 2024, upon the following parties:

Crystal L. Stamos  
12811 Captain Drive  
Chester, VA 23836

PIA J. NORTH, ESQUIRE  
NORTH & ASSOCIATES  
5913 HARBOUR PARK DRIVE  
MIDLOTHIAN, VA 23112  
[pjn@pianorth.com](mailto:pjn@pianorth.com)

/s/ Suzanne E. Wade  
Suzanne E. Wade, Chapter 13 Trustee

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In re: Crystal L. Stamos, Debtor

12811 Captain Drive  
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XXX-XX-9135

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Chapter 13

**NOTICE OF MOTION AND NOTICE OF HEARING**

Suzanne E. Wade, Chapter 13 Trustee, has filed a motion with the Court requesting that your case be dismissed.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.**

If you do not want the Court to grant the relief sought in the Motion, or if you want the Court to consider your views on the Motion, then on or before seven (7) days before the date of the hearing, you or your attorney must:

X File with the Court, at the address shown below, a written response pursuant to Local Bankruptcy Rule 9013-1(H). If you mail your response to the Court for filing, you must mail it early enough so the Court will **receive** it on or before the date stated above.

Clerk of Court  
United States Bankruptcy Court  
701 East Broad Street, Suite 4000  
Richmond, Virginia 23219

You must also mail a copy to:

Suzanne E. Wade, Chapter 13 Trustee  
7202 Glen Forest Dr., Suite 202  
Richmond, Virginia 23226

X Attend the hearing on the Motion, scheduled to be held on **August 21, 2024 at 11:15 a.m. at United States Bankruptcy Court, 701 East Broad Street, Room 5000, Richmond, Virginia, 23219.**

**Suzanne E. Wade, Chapter 13 Trustee**  
Virginia State Bar Number 31868  
7202 Glen Forest Dr., Suite 202  
Richmond, VA 23226  
(804) 775-0979

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Motion, and may enter an order granting that relief.

Date: July 1, 2024

/s/ Suzanne E. Wade  
Suzanne E. Wade, Chapter 13 Trustee

**CERTIFICATE OF SERVICE**

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/s/ Suzanne E. Wade  
Suzanne E. Wade, Chapter 13 Trustee

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